REMARKS/ARGUMENTS

Claims 1-23 are pending in the present application. Claims 7, 14, and 20 are canceled. Claims 1, 3, 5, 9, and 16 are amended. Reconsideration of the claims is respectfully requested.

I. Telephonic Interview with Examiner Neway on June 20, 2007

Applicants thank Examiner Samuel Neway for the courtesy extended to Applicants' representative during the June 20, 2007 telephonic interview. During the teleconference, the Examiner and Applicants' representative discussed proposed independent claim amendments to further distinguish the present invention from the cited reference. Examiner Neway appeared to indicate that the amended independent claim language contained in this Response to Office Action would overcome the cited prior art reference. Therefore, it is Applicants' representative's understanding that barring additional materially relevant prior art being found in an updated search by Examiner Neway, the present claims are now in condition for allowance. The substance of the interview, as well as additional reasons that the claims are not anticipated, is summarized in the remarks of Sections II and III, which follow below.

II. 35 U.S.C. § 102, Anticipation, Claims 1-7, 9-14, 16-21, and 23

The Examiner rejects claims 1-7, 9-14, 16-21, and 23 under 35 U.S.C. § 102 as allegedly being anticipated by *Abel et al.*, U.S. Patent Application Publication No. 2003/0084401 ("Abel"). This rejection is respectfully traversed.

Dependent claims 7, 14, and 20 are canceled by this Response to Office Action. As a result, the rejection of these canceled dependent claims under 35 U.S.C. § 102 is now moot. However, the features of canceled dependent claims 7, 14, and 20 are incorporated into independent claims 1, 9, and 16, respectively.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). In this case, each and every feature of the presently claimed invention is not identically shown in the cited reference as arranged in the claims.

Amended independent claim 1 of the present invention, which is representative of amended independent claims 9 and 16 with regard to similarly recited subject matter, reads as follows:

1.   A method implemented on a computer system for validating a content of a locale source file, said method comprising:

inputting said locale source file that includes language and cultural data, wherein said language and cultural data are arranged by categories, keywords and elements in said locale source file;

detecting one or more of each said categories, keywords and elements in said locale source file;

extracting one or more of said elements with associated values from said locale source file;

storing each of said extracted elements as textual data in an element storage area;

formatting a text string of data using said textual data;

comparing said text string of data with a reference string to validate said content of said locale source file for language and cultural correctness, wherein said reference string includes character strings containing a desired form and content of said locale source file;

determining when said text string of data differs from said reference string;

providing an associated change for said text string of data when indicated by said determining step; and

applying said associated change to said textual data to automatically correct language and cultural errors in said locale source file.

In rejecting claim 1, the Examiner states:

> Claim 1:
> Abel discloses a method implemented on a computer system for validating the contents of a locale source file, which comprises information arranged by categories, keywords and elements (Abstract), said method comprising:
> detecting one or more of each of said categories, keywords and elements in said locale source file (FIG. 3 and related text); extracting one or more of said elements with associated values from said locale source file ("the appropriate localized property values associated with a selected characteristic are automatically applied to each control instance . . ." [0009], FIG. 10 and related text),
> storing each of said extracted elements as textual data in an element storage area ("property values are preferably obtained from a cached resource file" [0009]),
> formatting a text string of data using said textual data ("During the rendering of the Web page, the appropriate localized property values associated with a selected characteristic are automatically applied to each control instance that is found to include the key" [0009]), and
> validating said text string ("user then reviews the localization elements . . ." [0047]).

Office Action dated March 29, 2007, pages 2-3.

Abel teaches a method for "creating a Web page to reflect a local characteristic." Abel, page 1, paragraph [0001]. Abel further teaches that:

> A Web page is localized based on a selected characteristic, such as a culture, a skin, a filtered set of functions, or other desired trait. Each instance of a control type in a Web page that is to be localized includes a configurable key attribute that refers to a

localization element of one or more localized property values for the control type. During a rendering of the Web page, the localized property values corresponding to the control type and selected characteristic are automatically applied to each instance that includes the key. The property values are preferably *obtained* from a cached *resource file* that is *generated* from a data structure of *localization elements* stored in a database. A graphic user interface is provided for defining and managing localization elements in a database to *generate resource files* used for localizing a Web page. [Emphasis added].

Abel, Abstract.

In other words, the method as taught by the Abel reference utilizes localization elements stored in a database to generate resource files. The localization elements are defined and managed by using a graphic user interface. The data obtained from the resource files are used to localize Web pages. "A Web server...utilizes resource files...to localize Web pages of a Web application." Abel, page 4, paragraph [0034].

In contrast, as amended, claim 1 recites a method for "validating a content of a locale source file." In other words, the method as recited in amended claim 1 validates or authenticates locale source file content for "language and cultural correctness" by "comparing said text string of data with a reference string." Support for the claim 1 amendments may be found in the Specification on page 5, line 20, Figure 2b, step 252, page 7, lines 19-20 and 23-26, and page 15, lines 1-4 and 7-9. Abel does not teach validating the content of the resource files, but only generating the resource files from customized localization elements.

The Examiner cites Abel, paragraphs [0047]-[0048] and Figure 7, as teaching "validating said text string ('user then reviews the localization elements...')" and "...the step of validating said text string comprises the steps of...." Office Action dated March 29, 2007, pages 3 and 4, respectively. These Examiner-cited passages and figure read as follows:

[0047] FIG. 7 is a flow diagram illustrating logical steps for customizing localization elements that reflect a chosen culture for a selected Web application. As indicated above, each property of a localization element is assigned a neutral language value. Customizing a localization element involves providing an alternate value for each property based on the selected criteria, such as the culture. Customizing may include manually entering alternate custom values, automatically converting the neutral values, or causing another operation to provide localized alternate values. After selecting a Web application through a graphical user interface (GUI), a user of the GUI chooses, at a step 140, a culture for which the user will customize property values of the Web application. At a step 142, the user selects a link for customizing, which displays the localization elements of the Web application. The user then reviews the localization elements to find properties that do not have alternate property values for the chosen culture. At a step 144, the user selects a link of the graphical user interface to edit a localization element that does not include an alternate value for the chosen culture. At a step 146, the user enters the alternate property value through a Web form of the graphical user interface. In the present example, the alternate property value is a word or words in the language of

the culture chosen at step **140**. At a step **147**, the graphical user interface stores the alternate property value in the database.

[0048] At a decision step **148**, the user determines whether more localization elements require alternate values to be entered for the selected Web application. If another localization element requires an alternate value, the logic returns to step **144**, where another localization element is entered. If there are no more alternate values to be entered for the selected culture, a decision is made, at a decision step **150**, whether to enter more alternate values corresponding to a different culture. This may be possible if the use is multilingual, for example. If alternate values can be entered for a different culture, the logic returns to step **140** for the user to choose another culture. Once the alternate values for the localization elements have been entered for all of the cultures that the Web designer determined should be supported by the Web application, the database of localization elements are ready for use in generating resource files. Those skilled in the art will recognize that the customization steps may be automated and/or assisted using online and offline language and translation dictionaries, and other sources of alternate values. [Emphasis added].

FIG. 7
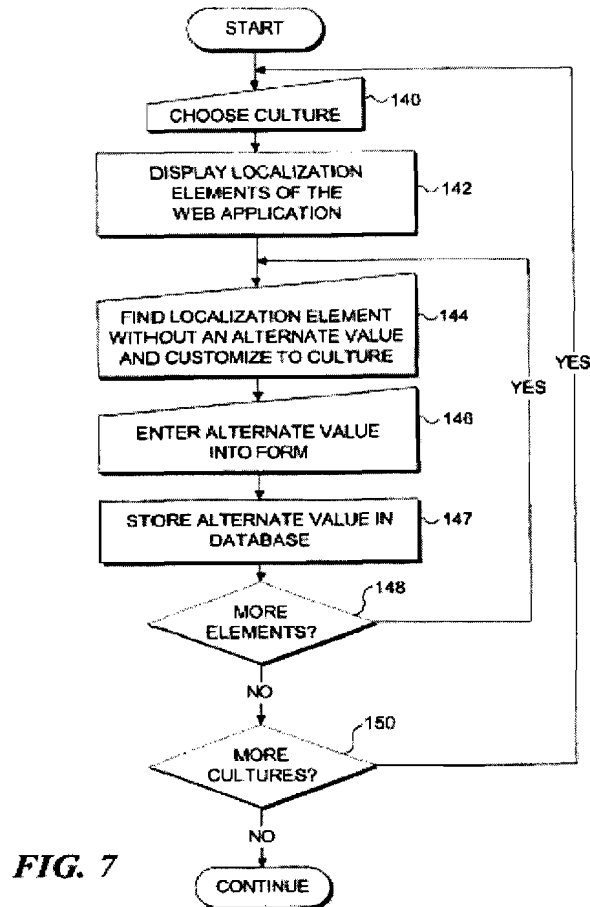
Abel, paragraphs [0047]-[0048] and Figure 7, respectively.

As the passages and figure clearly illustrates above, the Abel reference teaches a method for "customizing localization elements." "Customizing a localization element involves providing an alternate value for each property based on the selected criteria, such as the culture." After choosing a culture for which the user will customize property values of the Web application using a graphical user interface, "the user then reviews the localization elements to find properties that do not have alternate property values for the chosen culture." "Once the alternate values for the localization elements have been entered...the database of localization elements are ready for use in generating resource files."

In other words, Abel teaches the customization of localization elements for the generation of resource files, which are used to localize Web pages. Abel does not teach a method for validating the content of the resource files. Neither the Examiner-cited passages above nor any other section of the Abel reference teach that the user is reviewing the localization elements for correctness or to validate the localization elements as the Examiner alleges. The user is only reviewing the localization elements for the purpose of customizing properties that do not have alternate property values. A method for customization of localization elements as taught by the Abel reference is not analogous to a method for validation of locale source file content as recited in amended claim 1.

Even if the Abel reference does teach that the user is validating localization elements, which the Abel reference does not, validating localization elements is distinguishable from validating resource files. The method as taught by the Abel reference generates the resource files from the customized localization elements. Abel does not teach a method to subsequently validate generated resource files for language and cultural correctness. However, amended claim 1 recites a method for "validating a content of a locale source file" by "comparing said text string of data with a reference string to validate said content of said locale source file for language and cultural correctness, wherein said reference string includes character strings containing a desired form and content of said locale source file; determining when said text string of data differs from said reference string; providing an associated change for said text string of data when indicated by said determining step; and applying said associated change to said textual data to automatically correct language and cultural errors in said locale source file." Therefore, Abel does not teach these recited claim 1 features.

As a result, Abel does not identically teach each and every element recited in amended claim 1 of the present invention. Accordingly, the rejection of independent claims 1, 9, and 16 as being anticipated by Abel has been overcome.

In view of the arguments above, amended independent claims 1, 9, and 16 are in condition for allowance. Claims 2-6, 10-13, 17-19, 21, and 23 are dependent claims depending on independent claims 1, 9, and 16, respectively. Consequently, claims 2-6, 10-13, 17-19, 21, and 23 also are allowable, at least by virtue of their dependence on allowable claims.

Accordingly, the rejection of claims 1-6, 9-13, 16-19, 21, and 23 under 35 U.S.C. § 102 has been overcome.

III.   35 U.S.C. § 103, Obviousness, Dependent Claims 8, 15, and 22

The Examiner rejects dependent claims 8, 15, and 22 under 35 U.S.C. § 103 as allegedly being unpatentable over Abel in view of *Schumacher et al.*, U.S. Patent No. 6,219,632 ("Schumacher"). This rejection is respectfully traversed.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). For an invention to be *prima facie* obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). In this case, the Examiner has not met this burden because all of the recited features of these claims are not found in the cited prior art references as believed by the Examiner. Therefore, the combination of Abel and Schumacher will not reach the presently claimed invention recited in these claims.

As shown in Section II above, Abel does not teach or suggest all claim limitations as recited in amended independent claims 1, 9, and 16 of the present invention. In particular, Abel does not teach or suggest "validating a content of a locale source file" by "comparing said text string of data with a reference string to validate said content of said locale source file for language and cultural correctness, wherein said reference string includes character strings containing a desired form and content of said locale source file; determining when said text string of data differs from said reference string; providing an associated change for said text string of data when indicated by said determining step; and applying said associated change to said textual data to automatically correct language and cultural errors in said locale source file" as recited in the independent claims. These features also are not taught or suggested by the Schumacher reference nor does the Examiner cite to any section of the Schumacher reference that allegedly does so. The Examiner only cites the Schumacher reference as disclosing "a method for managing and translating information across different locales where the locale files could be POSIX (col. 3, lines 58-61)." Office Action dated March 29, 2007, page 5, item 4. Therefore, Schumacher does not teach or suggest these recited claim 1, 9, and 16 features.

Therefore, because neither Abel nor Schumacher teach or suggest "validating a content of a locale source file" by "comparing said text string of data with a reference string to validate said content of said locale source file for language and cultural correctness, wherein said reference string includes character strings containing a desired form and content of said locale source file; determining when said text string of data differs from said reference string; providing an associated change for said text string of data when indicated by said determining step; and applying said associated change to said textual data to

automatically correct language and cultural errors in said locale source file" as recited in amended claims 1, 9, and 16, the combination of Abel and Schumacher cannot teach or suggest these recited features. Claims 8, 15, and 22 are dependent claims depending on independent claims 1, 9, and 16, respectively. As a result, dependent claims 8, 15, and 22 also are allowable at least by virtue of their dependence upon allowable claims.

Accordingly, the rejection of dependent claims 8, 15, and 22 as allegedly being unpatentable over Abel in view of Schumacher has been overcome.

IV.   Conclusion

It is respectfully urged that the subject application is patentable over the cited prior art references and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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